

9.0 EXISTING DEVELOPMENT

9.1 Introduction

Stormwater discharges from commercial and industrial facilities can become contaminated when material management practices allow exposure to stormwater and/or there is commingling of runoff with wastes. The purpose of **DAMP Section 9.0** is to provide a programmatic framework for the regulatory oversight of activities in commercial and industrial areas. Through inspections, outreach and requiring compliance with water quality ordinances, the Permittees are able to pro-actively address the quality of urban and stormwater runoff from industrial and commercial facilities. In addition, **DAMP Section 9.0** also provides a programmatic framework, based upon education and outreach approaches, for addressing activities in residential areas. Both the industrial/commercial and residential elements were added to the Program by the Third Term Permits.

9.2 Accomplishments

9.2.1 Model Industrial/Commercial Program

The Model Industrial/Commercial Program was developed and implemented in 2002-03. It transformed the Permittees oversight of commercial and industrial facilities/activities by establishing a formal inspection program where previously there had been a series of notifications and inspections initiated by complaints. The Model Industrial/Commercial Program requires the Permittees to:

- Identify and inventory facilities/activities with the potential to discharge pollutants:

Initially, 8,546 industrial facilities (**Table 9.1; Figure 9.1**) and 22,789 commercial facilities were identified and inventoried (**Table 9.2; Figure 9.2**).

- Prioritize facilities based upon water quality threat and receiving water sensitivity:

The Permittees prioritized 8,546, 8,604 and 2,821 industrial facilities in 2002-03, 2003-04 and 2004-05 respectively. Concurrently, 22,789, 23,778, and 25,411 commercial facilities were similarly evaluated and prioritized over the same respective periods.

- Establish Model Maintenance Procedures:

Twenty-two (22) model BMP fact sheets have been prepared which include a description of specific minimum source control BMPs for common industrial and commercial activities that may discharge pollutants. Specific BMPs may be adjusted on a jurisdictional basis as necessary. Where applicable, optional controls have been identified that should be considered for implementation at high priority facilities.

Typically each fact sheet contains the following sections:

- Pollution Prevention

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- Suggested Best Management Practices
 - Training
 - References and Resources
- Conduct inspections and monitoring to ensure that commercial and industrial facilities are minimizing their impacts on the environment:

In the 2002-03, 2003-04 and 2004-05 reporting periods the Permittees completed 1,017, 4,029 and 2,706 inspections, respectively.

- Conduct inspections of food facilities:

The Orange County Permittees developed and submitted a food facility inspection program to the Santa Ana Regional Board on July 1, 2002. This program, which also meets the inspection requirements of the San Diego Regional Board, involves inspections and the distribution of educational materials at the approximately 10,000 existing restaurants countywide. The implementation of the Program is an addition to the environmental health inspections conducted by the County of Orange Health Care Agency (HCA). The HCA inspectors identify NPDES issues during these inspections, and they are forwarded to the respective Permittees and addressed by Permittee staff.

For the 2004-05 reporting period, 25,078 food facility inspections were conducted and 1,416 were reported to have NPDES issues (**Table 9.3**).

- Undertake Non-compliance Notification and Enforcement:

Enforcement for the industrial and commercial component of the Existing Development Program is the responsibility of individual Permittees. Each Permittee has several different levels of enforcement to choose from for different types of situations. This includes – from least severe to most severe – issuance of an educational letter, a notice of non-compliance, an administrative compliance order, a cease and desist order, or a misdemeanor/infraction.

The Permittees reported a total of 371 enforcement actions against industrial facilities during the 2004-05 reporting period

- Participate in Training:

To assist municipal staff in implementing the Existing Development Program for industrial and commercial facilities, five training modules were developed:

1. Existing Development Program Management Module (targeting jurisdictional program coordinators and providing guidance regarding management of an inspection program;
2. Field Implementation of Existing Development Program Module (targeting inspectors and providing guidance on conducting inspections);

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3. Existing Development Program Training – Automobile Mechanical Repair, Maintenance, Fueling and Cleaning Businesses Module;
 4. Existing Development Program Training – Landscape Maintenance Businesses Module, and
 5. Existing Development Program Training – Industrial Stormwater Monitoring Module.
- Conduct Education and Outreach:

A number of education and outreach efforts, conducted under the overall public education element of the Program (see **DAMP Section 6.0**), directly supported implementation of the Model Industrial Commercial Program, specifically:

Mailings – During 2003-05 there was one mass mailing of an outreach letter for corporate environmental managers of food service establishments (FSE) and one mass mailing of education materials to all Orange County FSEs.

Outreach Materials –The following materials were developed by the Public Education Committee supportive of **Section 9.0**:

Brochures

- *Mobile Detailing and the Water Quality Act*
- *Water Quality Guidelines for Exterior Restaurant Cleaning Operations*
- *Water Quality Guidelines for Carpet Cleaning Activities*
- *Help Prevent Ocean Pollution: Tips for Hardscape and Landscape Drains*
- *Help Prevent Ocean Pollution: Tips for Home Improvement*

Posters

- Food/Restaurant Industry
- “*Help Prevent Ocean Pollution*” Food Facility BMPs Poster
- Auto Repair Industry
- Good Gas Station Operating Practices

“The Quad” - “The Quad” was developed as a tool to communicate with Cities, Businesses, Utilities and Organizations. Each Quad contains a newsletter, press release, fact sheet and billing insert focusing on a seasonal stormwater theme. Four seasonal quads were created during this reporting period, two of which were distributed in this reporting period. The following were the 2004-05 Quad themes:

- “Spring Into Cleaning – Disposal of Household Hazardous Waste”
- “Summer: Yard Care”
- “Fall: Prepare for the Rainy Season”
- “Winter: New Years Resolution – Green in the New Year”

FSE Outreach – The following materials were developed specifically for FSEs.

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- *"Help Prevent Ocean Pollution": A Guide for Food Service Establishments*
- *"Help Prevent Ocean Pollution" Food Facility BMPs Poster*
- *"Help Prevent Ocean Pollution" Food Facility BMPs Stickers*
- *Bilingual CD-Rom illustrating appropriate Food Facility BMPs*
- *Food Facility BMP PowerPoint Presentation*
- *Food Facility BMP Fact Sheet*

Other: Developed an urban nutrient outreach program targeting independent gardeners operating in the San Diego Creek/Newport Bay Watershed with Proposition 13 funding awarded to the County to investigate the sources of nutrients from the urban environment and test the effectiveness of structural and non-structural BMPs.

9.2.2 Model Residential Program

The Model Residential Program was developed and implemented in 2002-03 to further reduce pollutants potentially released into the environment from residential activities, including efforts to reduce over-watering. The main thrust of the residential program is to advocate pollution prevention practices as the most effective method to protect receiving water quality. The Model Residential Program requires the Permittees under the jurisdiction of the San Diego Regional Board to:

- Develop a source identification procedure and prioritize residential areas based on proximity to Environmentally Sensitive Areas (ESAs) within the Permittee's jurisdiction.
- Identify Best Management Practices (BMPs) most appropriate for each area, based on residential activities:

See discussion of Outreach Materials (below).

- Conduct public outreach and education:

A number of education and outreach efforts, conducted under the overall public education element of the Program (see **DAMP Section 6.0**), directly supported implementation of the Model Residential Program, specifically:

Outreach Materials -The following materials were developed by the Public Education Committee supportive of **Section 9.0**:

Brochures

- *Help Prevent Ocean Pollution: Tips for Hardscape and Landscape Drains*
- *Help Prevent Ocean Pollution: Tips for Horse Care*
- *Help Prevent Ocean Pollution: Tips for Using Paint*
- *Help Prevent Ocean Pollution: Tips for Home Improvement*

"The Quad" - "The Quad" was developed as a tool to communicate with

cities, businesses, utilities and organizations such as home owner associations. Each Quad contains a newsletter, press release, fact sheet and billing insert focusing on a seasonal stormwater theme. Four seasonal quads were created during this reporting period, two of which were distributed in this reporting period. The following were the 2004-05 Quad themes:

- “Spring Into Cleaning – Disposal of Household Hazardous Waste”
- “Summer: Yard Care”
- “Fall: Prepare for the Rainy Season”
- “Winter: New Years Resolution – Green in the New Year”

9.2.3 Other Programs

During the reporting period, the Principal Permittee developed an urban nutrient outreach program targeting residential gardeners operating in the San Diego Creek/Newport Bay Watershed. The outreach program was one element of a Proposition 13 funded investigation of nutrient sources in an urban environment and structural and non-structural BMP effectiveness.

9.3 **Assessment**

The current and potential Program Effectiveness Assessment Outcome Levels that could be assessed within the current program are summarized in **Table 9-4** (Industrial/Commercial) and **Table 9.5** (Residential).

9.3.1 Model Industrial/Commercial Program

Inventories: Completing the inventory of industrial and commercial facilities has been problematic for some jurisdictions since the Standard Industrial Classification (SIC) codes on the business licenses (the primary source of this information for those jurisdictions with a business license program) have been incorrectly provided by businesses.¹ In addition, inventorying commercial facilities is extremely difficult because they are numerous, often transitory, and can only be identified through site visits. Mobile businesses are particularly problematic because they typically do not have a permanent facility location.

The Unified Annual Progress Reports include tables reporting the total number of commercial and industrial facilities and their respective prioritizations, organized by

¹ The Notice of Intent (NOI) form attached to the Draft Industrial General Permit (February 2005) and the SWRCB’s NOI processing system have been modified to accept both Standard Industrial Classification (SIC) codes and North American Industrial Classification System (NAICS) codes. The USEPA has indicated it intends to incorporate the NAICS codes into the storm water regulations but has not yet done so. The Proposed 2006 Multi-Sector General Permits for Stormwater Discharges Associated with Industrial Activity (MSGP) contains a note that “a complete list of SIC Codes (and conversions from the newer North American Industry Classification System [NAICS]) can be obtained from the Internet at www.census.gov/epcd/www/naics.html or in paper form from various locations in the document titled Handbook of Standard Industrial Classifications, Office of Management and Budget, 1987.”

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Permittee. However, since the structure and content of the jurisdictional databases can differ between the Permittees, analysis of data on a regional or countywide basis is challenging. Indeed, there appears to be a persistent disparity between the number of industrial and commercial facilities inventoried and the number of industrial and commercial facilities that were prioritized over the reporting period (see **Tables 9.1** through **9.3** and **Figures 9.1** through **9.2**). This disparity points to the need to augment facility descriptions beyond SIC codes.

DAMP Modification:

- Provide more detailed industrial and commercial facility descriptions to assist in inventory standardization.

Prioritization: Commercial and industrial facilities must be classified as high, medium, or low priority to determine the frequency of inspection. The DAMP details a risk and receiving water sensitivity based point system for classification, the result of which is a total score indicating the facility priority. A change in facility prioritization can be indicative of programmatic success, since a finding that BMPs are being implemented (a behavior change) reduces the risk of pollutants being discharged which can result in a change in prioritization. However, both Permits specify mandatory high-priority commercial and industrial facilities. In addition, the San Diego Region Permittees are required to inventory only high-priority commercial facilities i.e. there are no designation of medium and low priority commercial facilities.

Headline Indicator – Prioritization of Facilities (Industrial Facilities): For 2004-05, 2,821 industrial facilities were prioritized, 27% of which were ranked as high priority; for 2003-04, 8,604 industrial facilities were prioritized, 13% of which were ranked as high priority; and for 2002-03, 8,546 industrial facilities were prioritized, 15% of which were ranked as high priority (**Table 9.1; Figure 9.1**).

- ☒ Level 1: Implement Program
- ☒ Level 3: Behavior Change

Headline Indicator – Prioritization of Facilities (Commercial Facilities): For 2004-05, 25,411 commercial facilities were prioritized, 20% of which were ranked as high priority; for 2003-04, 23,778 commercial facilities were prioritized, 24% of which were ranked as high priority; and for 2002-03, 22,789 commercial facilities were prioritized, 22% of which were ranked as high priority (**Table 9.2; Figure 9.2**).

☒ Level 1: Implement Program

☒ Level 3: Behavior Change

The year-to-year comparisons suggest some inconsistent reporting of this indicator. Part of this inconsistency arises from the interpretation of the extent to which a facility “tributary to” a sensitive receiving water, which is a key determinant in prioritization. From the Annual Progress Reports (See **DAMP Appendix C**), it is evident that “tributary to” is variously being interpreted as more than “next to” but “less than the whole watershed.” Also, although the point system is used by many of the Permittees, some perceive it as time-consuming and too subjective, and, as a result, may rely primarily on professional judgment. In addition, the ability of the prioritization process to meaningfully provide for a risk-based approach is also dampened by the requirements for mandatory high priority sites. Despite these reservations, it is possible that the decreased numbers of high priority sites in the most recent annual reporting period may also reflect increased findings of no stormwater exposures and diminished site risk.

ROWD Commitment:

- Develop a more detailed prioritization process to improve standardized reporting and to support re-direction of inspection resources to significant sources of priority constituents of concern

Inspection: The Permittees generally conduct two types of inspections: compliance inspections and follow-up inspections. Should an inspected site demonstrate non-compliance, inspection frequency must be increased as specified in the Permits until compliance is achieved. Although these inspections are generally viewed as beneficial, there is a regulatory agency perception (highlighted in meetings with Regional Board staff) that the inspections may be missing key items of concern and discouraging findings of non-compliance which add to the inspection burden by requiring additional follow-up activity.

Headline Indicator – Number of BMPs Implemented (Industrial Facilities): For 2004-05, 2,706 industrial facilities were reported to have BMP implementation, 68% of which have full BMP implementation; for 2003-04, 4,029 industrial facilities were reported to have BMP implementation, 59% of which have full BMP implementation; and for 2002-03, 1,026 industrial facilities were reported to have BMP implementation, 53% of which have full BMP implementation (**Table 9.6; Figure 9.3**).

☒ Level 1: Implement Program

☒ Level 3: Behavior Change

Headline Indicator – Number of BMPs Implemented (Commercial Facilities): For 2004-05, 5,566 commercial facilities were reported to have BMP implementation, 59% of which have full BMP implementation; for 2003-04, 8,484 commercial facilities were reported to have BMP implementation, 77% of which have full BMP implementation; and for 2002-03, 1,389 commercial facilities were reported to have BMP implementation, 63% of which have full BMP implementation (**Table 9.7; Figure 9.4**).

☒ Level 1: Implement Program

☒ Level 3: Behavior Change

It is also proving difficult for the inspectors to categorize BMP implementation at commercial and industrial sites along a three-point scale (fully, partially, or not implemented) because such a scale requires overly subjective determinations. Lastly, the requirement for follow-up inspections of all non-compliant sites every month is perceived to be excessive due to the already large number of sites in many cities' inventories.

ROWD Commitment:

- Develop effective alternative to re-inspection such as self-certification.

Headline Indicator – Food Facility Inspections: For the 2004-05 reporting period, 25,078 food facility inspections were conducted and 1,416 were reported to have NPDES issues (**Table 9.3**). For the 2003-04 reporting period, 12,635 food facility inspections were conducted and 1,298 were reported to have NPDES issues in the six month period of program implementation.

☒ Level 1: Implement Program

☒ Level 3: Behavior Change

The 2003-04 comparison suggests that food facility inspections and the associated education and outreach efforts are having a positive impact since the incidence of NPDES issues decreases from 1 in 10 inspections to 1 in 17 inspections .

Enforcement: Permittees are required to use a progressive enforcement approach and initiate enforcement actions where commercial and industrial facilities are found to be out of compliance. In general, specific facilities that are repeat offenders are identified through active database inventories and, in most cases, progressive enforcement is used to bring repeat offenders into compliance.

Headline Indicator – Number and Level of Enforcement Actions (Industrial Facilities): The Permittees reported a total of 371 enforcement actions against industrial facilities during the 2004-05 reporting period, 3,146 during the 2003-04 reporting period, and 533 during the 2002-03 reporting period (**Table 9.8**). The 2004-05 figure represents an 89% decrease from the total reported in 2003-04.

☒ Level 1: Implement Program

☒ Level 3: Behavior Change

Headline Indicator – Number and Level of Enforcement Actions (Commercial Facilities): The Permittees reported a total of 1,192 enforcement actions against commercial facilities during the 2004-05 reporting period, 1,534 during the 2003-04 reporting period, and 490 during the 2002-03 reporting period (**Table 9.9**). The 2004-05 figure represents a 22% decrease from the total reported in 2003-04.

☒ Level 1: Implement Program

☒ Level 3: Behavior Change

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The 2003-04 comparison suggests some inconsistent reporting (e.g. Newport Beach, which compiled enforcement activity data in 2004-05 Unified Report, Section 2.10.0). However, the consistent pattern of reduced enforcement activity in the most recent reporting period across the Construction, Existing Development, and Illegal Discharges/Illicit Connections areas of the Program also suggests an increased level of compliance, also viewed as behavior change, by the regulated community.

Training: The Permits require that staff is adequately trained. In response, the Permittees developed several training modules, which are provided annually throughout the year. The training that has taken place has been deemed helpful. However, the training modules need to be updated frequently enough to keep pace with the developments in the field of stormwater management, maintain staff interest, and to provide inspectors with a technical understanding of a broad array of BMPs that can be shared with facility owner/operators.

ROWD Commitment:

- Prepare defined expertise and competencies for authorized inspector positions and develop a training schedule to meet these requirements

9.3.2 Model Residential Program

The Residential Model Program was developed to fulfill the residential activity and related commitments and requirements of Section F.3.d of the SDR Permit. The Common Interest Areas/Homeowners Associations (CIA/HOA) Activities Program was developed to fulfill the existing CIA/HOA activity commitments and requirements of Section F.6 of the SDR Permit.

Identification and Inventory: The SDR Permittees are required to identify high priority areas and activities as defined in the Permit. CIAs are considered to include high-priority areas and activities.

BMP Implementation: The SDR Permittees are required to identify minimum BMPs for high-priority areas and activities and, as necessary, additional controls. Some Permittees use a baseline BMP implementation approach for Residential areas and CIAs/HOAs unless inspectors notice a specific concern.

Enforcement and Reporting: SDR Permittees are required to enforce their stormwater ordinances for all residential areas and activities as necessary to maintain Permit compliance. The primary issue with residential areas and CIAs/HOAs concerns over irrigation. Enforcement actions taken against CIAs/HOAs include letters or notices, which generally leads to resolution of the issues. Some Permittees have reported some limited success using self certifications as a tool for effective implementation of the program within residential and CIA/HOA areas.

9.4 Summary

The Third Term Permits have required the Permittees to develop and implement a formal inspection program commencing with an initial inventory of potentially 30,000 facilities being subject to municipal oversight for stormwater and urban runoff issues. Over the first three years of this effort, there has been a clear trend in the level of inspection and enforcement activity that, despite some uncertainties with respect to reporting, suggests increased BMP implementation and compliance with local water quality ordinances by the existing industrial and commercial sector in Orange County. Based upon perceived positive outcomes of the Existing Development elements of the DAMP, the Permittees are proposing minor program modifications based upon the need for the continued training of inspectors and the sensitizing of the prioritization and inspection process toward a more effective risk-based approach.

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Table 9.1: Countywide Permittees' Industrial Inventory and Prioritization, Comparison of 2002-03, 2003-04 and 2004-05

| PERMITTEE | HIGH 2002-03 | HIGH 2003-04 | HIGH 2004-05 | MEDIUM 2002-03 | MEDIUM 2003-04 | MEDIUM 2004-05 | LOW 2002-03 | LOW 2003-04 | LOW 2004-05 | TOTAL 2002-03 | TOTAL 2003-04 | TOTAL 2004-05 |
|------------------|-----------------|-----------------|-----------------|-------------------|-------------------|-------------------|----------------|----------------|----------------|------------------|------------------|------------------|
| Aliso Viejo | 2 | 2 | 2 | 65 | 65 | 42 | 0 | 0 | 0 | 67 | 67 | 44 |
| Anaheim | 129 | 115 | 93 | 419 | 45 | 0 | 868 | 1,126 | 299 | 1,416 | 1,286 | 392 |
| Brea | 11 | 14 | 13 | 32 | 28 | 27 | 167 | 137 | 111 | 210 | 179 | 151 |
| Buena Park | 24 | 184 | 115 | 52 | 18 | 17 | 0 | 17 | 27 | 76 | 219 | 159 |
| Costa Mesa | 489 | 287 | 13 | 329 | 475 | 2 | 0 | 40 | 128 | 818 | 802 | 143 |
| Cypress | 2 | 4 | 0 | 5 | 2 | 0 | 34 | 38 | 0 | 41 | 44 | 0 |
| Dana Point | NA | 0 | 0 | NA | 0 | 0 | NA | 0 | 0 | NA | 0 | 0 |
| Fountain Valley | 4 | 44 | 4 | 0 | 0 | 48 | 32 | 0 | 0 | 36 | 44 | 52 |
| Fullerton | 36 | 38 | 37 | 23 | 23 | 0 | 554 | 344 | 0 | 613 | 405 | 37 |
| Garden Grove | 25 | 41 | 30 | 35 | 51 | 11 | 310 | 296 | 25 | 370 | 388 | 66 |
| Huntington Beach | 30 | 25 | 30 | 38 | 69 | 13 | 645 | 529 | 23 | 713 | 623 | 66 |
| Irvine | 236 | 3 | 95 | 98 | 21 | 0 | 841 | 520 | 0 | 1,175 | 544 | 95 |
| La Habra | NA | 65 | 65 | NA | 249 | 48 | NA | 228 | 59 | NA | 542 | 172 |
| La Palma | 8 | 5 | 5 | 2 | 3 | 5 | 9 | 11 | 0 | 19 | 19 | 10 |
| Laguna Beach | 0 | 0 | 0 | 28 | 23 | | 35 | 14 | | 63 | 37 | 0 |
| Laguna Hills | NA | 1 | 0 | NA | 0 | 0 | NA | 0 | 0 | NA | 1 | 0 |
| Laguna Niguel | 2 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 2 | 1 | 0 |
| Laguna Woods | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Lake Forest | 11 | 11 | 12 | 0 | 0 | | 0 | 0 | | 11 | 11 | 12 |
| Los Alamitos | 6 | 7 | 1 | 71 | 19 | 27 | 24 | 96 | 23 | 101 | 122 | 51 |
| Mission Viejo | 5 | 4 | 4 | 30 | 31 | | 56 | 56 | | 91 | 91 | 4 |
| Newport Beach | 2 | 2 | 2 | 0 | 0 | 0 | 11 | 11 | 11 | 13 | 13 | 13 |
| Orange | 69 | 52 | 72 | 422 | 416 | 228 | 256 | 249 | 0 | 747 | 717 | 300 |
| Placentia | 21 | 16 | 12 | 18 | 0 | | 6 | 109 | 40 | 45 | 125 | 52 |
| R S Margarita | 1 | 1 | 3 | 10 | 10 | 10 | 19 | 19 | 19 | 30 | 30 | 32 |
| San Clemente | 2 | 3 | 2 | 72 | 72 | | 0 | 0 | | 74 | 75 | 2 |
| S J Capistrano | 1 | 1 | 1 | 11 | 5 | 5 | 15 | 8 | 4 | 27 | 14 | 10 |
| Santa Ana | 102 | 100 | 82 | 1,266 | 1,031 | 615 | 0 | 574 | 5 | 1,368 | 1,705 | 702 |
| Seal Beach | 2 | 2 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 2 | 2 | 2 |
| Stanton | NA | 18 | 18 | NA | 17 | 15 | NA | 118 | 0 | NA | 153 | 33 |
| Tustin | 9 | 11 | 13 | 59 | 6 | 7 | 0 | 49 | 55 | 68 | 66 | 75 |
| Villa Park | NA | 0 | 0 | NA | 0 | 0 | NA | 0 | 0 | NA | 0 | 0 |
| Westminster | 10 | 4 | 4 | 37 | 18 | 18 | 34 | 6 | 6 | 81 | 28 | 28 |
| Yorba Linda | 29 | 4 | 7 | 214 | 206 | 88 | 0 | 13 | 2 | 243 | 223 | 97 |
| County of Orange | 13 | 16 | 12 | 13 | 12 | 9 | 0 | 0 | 0 | 26 | 28 | 21 |
| TOTALS | 1,281 | 1,081 | 749 | 3,349 | 2,915 | 1,235 | 3,916 | 4,608 | 837 | 8,546 | 8,604 | 2,821 |

NA = Not Available

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Table 9.2: Countywide Permittees' Commercial Inventory and Prioritization, Comparison of 2002-03, 2003-04 and 2004-05

| PERMITTEE | HIGH 2002-03 | HIGH 2003-04 | HIGH 2004-05 | MEDIUM 2002-03 | MEDIUM 2003-04 | MEDIUM 2004-05 | LOW 2002-03 | LOW 2003-04 | LOW 2004-05 | TOTAL 2002-03 | TOTAL 2003-04 | TOTAL 2004-05 |
|------------------|-----------------|-----------------|-----------------|-------------------|-------------------|-------------------|----------------|----------------|----------------|------------------|------------------|------------------|
| Aliso Viejo | 153 | 153 | 110 | 0 | 0 | | 0 | 0 | | 153 | 153 | 110 |
| Anaheim | 114 | 14 | 13 | 278 | 310 | 310 | 194 | 307 | 307 | 586 | 631 | 630 |
| Brea | 0 | 0 | 0 | 138 | 117 | 129 | 0 | 180 | 228 | 138 | 297 | 357 |
| Buena Park | 0 | 119 | 283 | 5 | 40 | 20 | 0 | 50 | 26 | 5 | 209 | 329 |
| Costa Mesa | 1,306 | 1,107 | 969 | 587 | 555 | 483 | 4,559 | 2,548 | 2,083 | 6,452 | 4,210 | 3,535 |
| Cypress | 0 | 56 | 2 | 38 | 162 | 19 | 39 | 6 | 203 | 77 | 224 | 224 |
| Dana Point | 238 | 205 | 228 | 0 | 0 | | 0 | 0 | | 238 | 205 | 228 |
| Fountain Valley | 0 | 112 | 40 | 0 | 0 | 77 | 314 | 139 | 139 | 314 | 251 | 256 |
| Fullerton | 7 | 7 | 126 | 23 | 23 | 164 | 639 | 631 | 116 | 669 | 661 | 406 |
| Garden Grove | 0 | 7 | 47 | 102 | 90 | 204 | 5,797 | 5,807 | 5,587 | 5,899 | 5,904 | 5,838 |
| Huntington Beach | 403 | 261 | 276 | 7 | 170 | 206 | 233 | 920 | 831 | 643 | 1,351 | 1,313 |
| Irvine | 0 | 0 | | 105 | 103 | 148 | 1,040 | 1,038 | 1,132 | 1,145 | 1,141 | 1,280 |
| La Habra | NA | 378 | 414 | NA | 340 | 306 | NA | 177 | 254 | NA | 895 | 974 |
| La Palma | 0 | 0 | | 17 | 18 | 12 | 25 | 30 | 31 | 42 | 48 | 43 |
| Laguna Beach | 336 | 356 | | 0 | 2 | | 0 | 7 | | 336 | 365 | 0 |
| Laguna Hills | NA | 237 | 325 | NA | 0 | | NA | 0 | | NA | 237 | 325 |
| Laguna Niguel | 182 | 183 | 177 | 0 | 0 | | 0 | 0 | | 182 | 183 | 177 |
| Laguna Woods | 28 | 24 | 24 | 3 | 3 | 3 | 65 | 83 | 89 | 96 | 110 | 116 |
| Lake Forest | 10 | 124 | 150 | 17 | 68 | | 50 | 182 | | 77 | 374 | 150 |
| Los Alamitos | NA | 98 | | 173 | 32 | | 800 | 0 | | 973 | 130 | 0 |
| Mission Viejo | 426 | 423 | 484 | 0 | 0 | | 0 | 0 | | 426 | 423 | 484 |
| Newport Beach | 41 | 41 | 41 | 40 | 40 | 40 | 40 | 40 | 42 | 121 | 121 | 123 |
| Orange | 269 | 0 | | 241 | 311 | 311 | 54 | 700 | 725 | 564 | 1,011 | 1,036 |
| Placentia | 127 | 375 | | 44 | 0 | | 310 | 0 | 373 | 481 | 375 | 373 |
| R S Margarita | 126 | 146 | 141 | 13 | 0 | 0 | 377 | 0 | 438 | 516 | 146 | 579 |
| San Clemente | 463 | 688 | 626 | 0 | 0 | | 0 | 0 | | 463 | 688 | 626 |
| S J Capistrano | 248 | 316 | 216 | 0 | 0 | 277 | 0 | 0 | 1,401 | 248 | 316 | 1,894 |
| Santa Ana | 0 | 0 | | 779 | 26 | 26 | 1 | 917 | 923 | 780 | 943 | 949 |
| Seal Beach | NA | 0 | 23 | NA | 183 | 2 | NA | 0 | 859 | NA | 183 | 884 |
| Stanton | NA | 31 | 31 | NA | 168 | 168 | NA | 476 | 476 | NA | 675 | 675 |
| Tustin | 1 | 0 | 1 | 103 | 104 | 39 | 0 | 0 | 40 | 104 | 104 | 80 |
| Villa Park | 0 | 0 | 0 | 0 | 1 | 1 | 0 | 6 | 6 | 0 | 7 | 7 |
| Westminster | 354 | 140 | 213 | 95 | 365 | 443 | 278 | 354 | 428 | 727 | 859 | 1,084 |
| Yorba Linda | 20 | 25 | 42 | 171 | 162 | 126 | 0 | 6 | 5 | 191 | 193 | 173 |
| County of Orange | 97 | 107 | 106 | 46 | 48 | 47 | 0 | 0 | 0 | 143 | 155 | 153 |
| TOTALS | 4,949 | 5,733 | 5,108 | 3,025 | 3,441 | 3,561 | 14,815 | 14,604 | 16,742 | 22,789 | 23,778 | 25,411 |

NA = Not Available

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Table 9.3: Food Facility Inspections 2003-04 and 2004-05

| PERMITTEE | 2003-04 | | 2004-05 | |
|------------------------|----------------------------|---------------------|----------------------------|---------------------|
| | No. of Routine Inspections | No. of NPDES Issues | No. of Routine Inspections | No. of NPDES Issues |
| Aliso Viejo | 116 | 50 | 218 | 37 |
| Anaheim | 1721 | 40 | 3,285 | 22 |
| Brea | 256 | 19 | 506 | 23 |
| Buena Park | 301 | 91 | 686 | 12 |
| Costa Mesa | 724 | 98 | 1,412 | 74 |
| Cypress | 175 | 12 | 421 | 0 |
| Dana Point | 186 | 9 | 374 | 12 |
| Fountain Valley | 313 | 72 | 545 | 22 |
| Fullerton | 539 | 46 | 1,054 | 123 |
| Garden Grove | 738 | 2 | 1,412 | 280 |
| Huntington Beach | 691 | 64 | 1,420 | 17 |
| Irvine | 718 | 169 | 1,388 | 52 |
| La Habra | 273 | 11 | 548 | 40 |
| La Palma | 42 | 18 | 118 | 1 |
| Laguna Beach | 203 | 7 | 382 | 31 |
| Laguna Hills | 149 | 91 | 332 | 72 |
| Laguna Niguel | 193 | 21 | 406 | 16 |
| Laguna Woods | 24 | 18 | 59 | 13 |
| Lake Forest | 307 | 8 | 547 | 27 |
| Los Alamitos | 98 | 12 | 193 | 8 |
| Mission Viejo | 325 | 51 | 591 | 40 |
| Newport Beach | 501 | 33 | 1,037 | 20 |
| Orange | 725 | 25 | 1,451 | 61 |
| Placentia | 185 | 8 | 386 | 18 |
| Rancho Santa Margarita | 95 | 0 | 179 | 23 |
| San Clemente | 284 | 5 | 529 | 7 |
| San Juan Capistrano | 1261 | 111 | 302 | 17 |
| Santa Ana | 141 | 28 | 2,436 | 145 |
| Seal Beach | 122 | 13 | 217 | 3 |
| Stanton | 168 | 20 | 504 | 1 |
| Tustin | 377 | 12 | 648 | 60 |
| Villa Park | 18 | 1 | 26 | 1 |
| Westminster | 418 | 123 | 931 | 96 |
| Yorba Linda | 139 | 4 | 328 | 23 |
| County of Orange | 109 | 6 | 207 | 19 |
| Totals | 12635 | 1298 | 25,078 | 1,416 |

SECTION 9.0, EXISTING DEVELOPMENT

Table 9.4: Current and Potential Outcome Levels (Industrial/Commercial)

| Industrial/Commercial Program Component | Effectiveness Assessment Outcome Levels | | | | | |
|--|---|--|---|--|----------------|-------------------------|
| | Level 1 | Level 2 | Level 3 | Level 4 | Level 5 | Level 6 |
| | Implement Program | Increase Awareness | Behavior Change | Load Reduction | Runoff Quality | Receiving Water Quality |
| Inventory | ✓ Maintain inventory | | | | | |
| Prioritization | ✓ Assign priorities | | ✓ Change in prioritization level | | | |
| Inspection | ✓ Conduct and Track number of inspections | | ✓ # BMPs implement | ^P Load reduction associated with BMPs | | |
| Enforcement/ Reporting | ✓ Conduct enforcement | | ✓ Extent and correction of problem level of enforcement | | | |
| Training | ✓ Track number/type of training sessions | ^P Surveys show improved knowledge | | | | |
| Key: ✓ = Currently Achieved Outcome Level ^P = Potentially Achievable Outcome Level | | | | | | |

SECTION 9.0, EXISTING DEVELOPMENT

Table 9.5: Current and Potential Outcome Levels (Residential)

| Residential & CIA/HOA Program Component | Effectiveness Assessment Outcome Levels | | | | | |
|--|---|---|------------------------------------|--|----------------|-------------------------|
| | Level 1 | Level 2 | Level 3 | Level 4 | Level 5 | Level 6 |
| | Implement Program | Increase Awareness | Behavior Change | Load Reduction | Runoff Quality | Receiving Water Quality |
| Identification/Inventory | ✓ Maintain inventory | | | | | |
| BMP Implementation | ✓ Conduct Inspections | ✓ BMP Implementation | ✓ Track number of BMPs implemented | ^P Load reduction associated with BMPs | | |
| Enforcement/ Reporting | ✓ Issue EAs | ✓ Track number of EAs issued & response | ^P Correction of problem | | | |
| <u>Key:</u> ✓ = Currently Achieved Outcome Level ^P = Potentially Achievable Outcome Level | | | | | | |

SECTION 9.0, EXISTING DEVELOPMENT

Table 9.6: Industrial Inventory and BMP Implementation, Comparison of 2002-03, 2003-04 and 2004-05

| PERMITTEE | NUMBER OF FACILITIES WITH BMPs: | | | | | | | | | | | | |
|------------------|---------------------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|----------------|----------------------|---------|---------|
| | FULLY | FULLY | FULLY | PARTIALLY | PARTIALLY | PARTIALLY | NO BMPs | NO BMPs | NO BMPs | Modify/Upgrade | TOTAL | TOTAL | TOTAL |
| | Implemented | Implemented | Implemented | Implemented | Implemented | Implemented | Implemented | Implemented | Implemented | or Implement | 2002-03 | 2003-04 | 2004-05 |
| | 2002-03 | 2003-04 | 2004-05 | 2002-03 | 2003-04 | 2004-05 | 2002-03 | 2003-04 | 2004-05 | BMP's | 2002-03 ^a | | |
| Aliso Viejo | 2 | 49 | 31 | 1 | 15 | 11 | 0 | 0 | | 1 | 4 | 64 | 42 |
| Anaheim | 0 | 160 | 312 | 0 | 82 | 80 | 0 | 0 | | 0 | 0 | 242 | 392 |
| Brea | NA | NA | 15 | NA | NA | | NA | NA | 10 | NA | NA | NA | 25 |
| Buena Park | NA | 188 | 151 | NA | 33 | 102 | NA | 0 | 29 | NA | NA | 221 | 282 |
| Costa Mesa | 142 | 530 | 115 | 0 | 168 | 28 | 0 | 0 | | 193 | 335 | 698 | 143 |
| Cypress | NA | 0 | NA | NA | 4 | NA | NA | 0 | NA | NA | 0 | 4 | NA |
| Dana Point | NA | 0 | NA | NA | 0 | NA | NA | 0 | NA | NA | NA | 0 | NA |
| Fountain Valley | 10 | 36 | 52 | 5 | 8 | | 5 | 0 | | 5 | 25 | 44 | 52 |
| Fullerton | 36 | 38 | 34 | NA | 23 | 2 | NA | 344 | | NA | 36 | 405 | 36 |
| Garden Grove | NA | 55 | 28 | NA | 43 | 38 | NA | 3 | 1 | NA | NA | 101 | 67 |
| Huntington Bch | 3 | 52 | 14 | 4 | 19 | 20 | 17 | 28 | 33 | 4 | 28 | 99 | 67 |
| Irvine | 136 | 132 | 37 | 31 | 467 | 58 | 12 | 68 | | 26 | 205 | 667 | 95 |
| La Habra | NA | 8 | 49 | NA | 57 | 108 | NA | 28 | 15 | NA | NA | 93 | 172 |
| La Palma | 0 | NA | 1 | 0 | NA | 6 | 0 | NA | 1 | 0 | 0 | NA | 8 |
| Laguna Beach | NA | 21 | | NA | 16 | | NA | 0 | | NA | NA | 37 | 0 |
| Laguna Hills | NA | NA | 0 | NA | NA | 0 | NA | NA | 0 | NA | NA | NA | 0 |
| Laguna Niguel | 3 | 0 | | 0 | 0 | | 0 | 0 | | 0 | 3 | 0 | 0 |
| Laguna Woods | NA | 0 | NA | NA | 0 | NA | NA | 0 | NA | NA | 0 | 0 | NA |
| Lake Forest | 0 | 0 | 12 | 11 | 11 | | 0 | 0 | | 0 | 11 | 11 | 12 |
| Los Alamitos | NA | 8 | | NA | 0 | | NA | 0 | | NA | 0 | 8 | 0 |
| Mission Viejo | 24 | 0 | 2 | 43 | 4 | 2 | 13 | 0 | | 56 | 136 | 4 | 4 |
| Newport Beach | 4 | 1 | 1 | 0 | 1 | 2 | 0 | 0 | | 0 | 4 | 2 | 3 |
| Orange | NA | 64 | 142 | NA | 2 | 149 | NA | 0 | 9 | NA | NA | 66 | 300 |
| Placentia | 16 | 0 | 3 | 14 | 19 | 7 | 12 | 2 | 1 | 14 | 56 | 21 | 11 |
| R S Margarita | 0 | 0 | 2 | 0 | 0 | 2 | 0 | 0 | 28 | 0 | 0 | 0 | 32 |
| San Clemente | NA | NA | 2 | NA | NA | 0 | NA | NA | 0 | NA | NA | NA | 2 |
| S J Capistrano | 1 | 10 | 8 | 2 | 4 | 2 | 0 | 0 | 0 | 1 | 4 | 14 | 10 |
| Santa Ana | NA | 818 | 639 | NA | 132 | 63 | NA | 0 | | NA | NA | 950 | 702 |
| Seal Beach | NA | 0 | 1 | NA | 2 | 1 | NA | 0 | 0 | NA | NA | 2 | 2 |
| Stanton | NA | 28 | 28 | NA | 4 | 58 | NA | 1 | 1 | NA | NA | 33 | 87 |
| Tustin | NA | 17 | 17 | NA | 49 | | NA | 0 | | NA | NA | 66 | 17 |
| Villa Park | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 0 |
| Westminster | 1 | 24 | 25 | 0 | 3 | 3 | 0 | 1 | | 0 | 1 | 28 | 28 |
| Yorba Linda | 166 | 130 | 94 | 0 | 0 | 3 | 1 | 0 | | 1 | 168 | 130 | 97 |
| County of Orange | NA | 19 | 16 | NA | 0 | 2 | NA | 0 | 0 | NA | 0 | 19 | 18 |
| TOTALS | 544 | 2,388 | 1,831 | 112 | 1,166 | 747 | 60 | 475 | 128 | 301 | 1,017 | 4,029 | 2,706 |

NA = Not Available

^a Modifications/Upgrades only applicable to 2002-03 reporting year.

SECTION 9.0, EXISTING DEVELOPMENT

Table 9.7: Commercial Inventory and BMP Implementation, Comparison of 2002-03, 2003-04 and 2004-05

| PERMITTEE | Number of Facilities with BMPs: | | | | | | | | | TOTAL 2002-03 | TOTAL 2003-04 | TOTAL 2004-05 |
|------------------|---------------------------------|---------------------------------|---------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-----------------------------------|-----------------------------------|-----------------------------------|------------------|------------------|------------------|
| | FULLY Implemented 2002-03 | FULLY Implemented 2003-04 | FULLY Implemented 2004-05 | PARTIALLY Implemented 2002-03 | PARTIALLY Implemented 2003-04 | PARTIALLY Implemented 2004-05 | NO BMPs Implemented 2002-03 | NO BMPs Implemented 2003-04 | NO BMPs Implemented 2004-05 | | | |
| Aliso Viejo | 69 | 35 | 35 | 4 | 64 | 75 | 8 | 4 | | 81 | 103 | 110 |
| Anaheim | 0 | 35 | 46 | 0 | 2 | 27 | 0 | 0 | | 0 | 37 | 73 |
| Brea | NA | 0 | 0 | NA | 0 | 0 | NA | 0 | 0 | NA | 0 | 0 |
| Buena Park | 0 | 183 | 98 | 5 | 29 | 60 | 0 | 0 | 43 | 5 | 212 | 201 |
| Costa Mesa | 623 | 3,298 | 64 | 0 | 665 | 2 | 0 | 0 | | 623 | 3,963 | 66 |
| Cypress | NA | 0 | | NA | 2 | 2 | NA | 0 | | 0 | 2 | 2 |
| Dana Point | NA | NA | 25 | NA | NA | 145 | NA | NA | 11 | NA | NA | 181 |
| Fountain Valley | 0 | 251 | 225 | 0 | 0 | | 0 | 0 | | 0 | 251 | 225 |
| Fullerton | NA | 0 | | NA | 0 | | NA | 0 | | NA | 0 | 0 |
| Garden Grove | NA | 66 | 824 | NA | 29 | 455 | NA | 3 | 4 | NA | 98 | 1,283 |
| Huntington Bch | 9 | 59 | 26 | 2 | 108 | 21 | 11 | 120 | 34 | 22 | 287 | 81 |
| Irvine | NA | DNR | | NA | DNR | | NA | DNR | | NA | DNR | 0 |
| La Habra | NA | 28 | 85 | NA | 107 | 111 | NA | 36 | 77 | NA | 171 | 273 |
| La Palma | 0 | 24 | 22 | 0 | 18 | 13 | 0 | 0 | | 0 | 42 | 35 |
| Laguna Beach | NA | NA | | NA | NA | | NA | NA | | NA | NA | 0 |
| Laguna Hills | 31 | 150 | 222 | 0 | 0 | | 3 | 10 | 5 | 34 | 160 | 227 |
| Laguna Niguel | 0 | 123 | 27 | 0 | 15 | 18 | 0 | 0 | | 0 | 138 | 45 |
| Laguna Woods | NA | 0 | | NA | 27 | 28 | NA | 0 | | 0 | 27 | 28 |
| Lake Forest | 0 | 0 | | 77 | 48 | 19 | 0 | 0 | | 77 | 48 | 19 |
| Los Alamitos | NA | 86 | | NA | 12 | | NA | 0 | | 0 | 98 | 0 |
| Mission Viejo | 68 | 164 | 268 | 314 | 51 | 29 | 57 | 0 | | 439 | 215 | 297 |
| Newport Beach | NA | NA | 6 | NA | NA | 6 | NA | NA | | NA | NA | 12 |
| Orange | NA | 207 | 0 | NA | 0 | 0 | NA | 0 | 0 | NA | 207 | 0 |
| Placentia | NA | 0 | 32 | 9 | 63 | 32 | NA | 0 | | 9 | 63 | 64 |
| R S Margarita | 0 | 0 | 64 | 0 | 0 | 21 | 0 | 0 | 482 | 0 | 0 | 567 |
| San Clemente | NA | 139 | NA | NA | 12 | NA | NA | 0 | NA | NA | 151 | NA |
| Santa Ana | NA | 818 | 304 | NA | 132 | 109 | NA | 0 | | NA | 950 | 413 |
| S J Capistrano | 75 | 139 | 132 | 7 | 12 | 0 | 15 | 0 | 0 | 97 | 151 | 132 |
| Seal Beach | NA | 0 | 0 | NA | 122 | 0 | NA | 0 | 0 | NA | 122 | 0 |
| Stanton | NA | 35 | 35 | NA | 10 | 10 | NA | 3 | 10 | NA | 48 | 55 |
| Tustin | NA | 0 | NA | NA | 0 | NA | NA | 0 | NA | NA | 0 | NA |
| Villa Park | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Westminster | 0 | 633 | 675 | 0 | 219 | 409 | 0 | 7 | | 0 | 859 | 1,084 |
| Yorba Linda | NA | 10 | 27 | NA | 27 | 7 | NA | 0 | | NA | 37 | 34 |
| County of Orange | 2 | 41 | 49 | NA | 3 | 10 | NA | NA | 0 | 2 | 44 | 59 |
| TOTALS | 877 | 6,524 | 3,291 | 418 | 1,777 | 1,609 | 94 | 183 | 666 | 1,389 | 8,484 | 5,566 |

NA = Not Available

DNR = Did Not Report

SECTION 9.0, EXISTING DEVELOPMENT

Table 9.8: Permittee Enforcement Actions for Industrial Facilities, Comparison of 2002-03, 2003-04 and 2004-05

| PERMITTEE | EL 2002-03 | EL 2003-04 | EL 2004-05 | NON 2002-03 | NON 2003-04 | NON 2004-05 | ACO 2002-03 | ACO 2003-04 | ACO 2004-05 | CDO 2002-03 | CDO 2003-04 | CDO 2004-05 | M/I 2002-03 | M/I 2003-04 | M/I 2004-05 | TOTAL 2002-03 | TOTAL 2003-04 | TOTAL 2004-05 |
|------------------|---------------|---------------|---------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|------------------|------------------|------------------|
| Aliso Viejo | 0 | 2 | 3 | 0 | 1 | 17 | 0 | 0 | 8 | 0 | 0 | | 0 | 0 | | 0 | 3 | 28 |
| Anaheim | NA | 0 | 0 | NA | 2 | 0 | NA | 1 | 0 | NA | 0 | 0 | NA | 0 | 0 | NA | 3 | 0 |
| Brea | 2 | 0 | 13 | 0 | 0 | 1 | 0 | 0 | | 0 | 0 | | 0 | 0 | | 2 | 0 | 14 |
| Buena Park | NA | 0 | 2 | NA | 39 | 6 | NA | 5 | 13 | NA | 1 | 4 | NA | 0 | 1 | NA | 45 | 26 |
| Costa Mesa | NA | 0 | | NA | 0 | | NA | 0 | | NA | 0 | | NA | 0 | | NA | 0 | 0 |
| Cypress | 0 | 0 | 0 | 0 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 2 | 0 |
| Dana Point | NA | 0 | 0 | NA | 0 | 0 | NA | 0 | 0 | NA | 0 | 0 | NA | 0 | 0 | NA | 0 | 0 |
| Fountain Valley | 5 | 393 | 52 | 0 | 8 | | 0 | 12 | 1 | 0 | 6 | 1 | 0 | 0 | | 5 | 419 | 54 |
| Fullerton | 36 | 0 | NA | 0 | 0 | NA | 0 | 0 | NA | 0 | 0 | NA | 0 | 0 | NA | 36 | 0 | NA |
| Garden Grove | 2 | 5 | 2 | 0 | 0 | | 0 | 0 | | 0 | 0 | | 0 | 0 | | 2 | 5 | 2 |
| Huntington Beach | 6 | 0 | | 0 | 0 | 5 | 0 | 15 | | 0 | 0 | | 0 | 0 | 1 | 6 | 15 | 6 |
| Irvine | NA | 939 | 95 | NA | 0 | | NA | 0 | | NA | 0 | | NA | 0 | | NA | 939 | 95 |
| La Habra | NA | 0 | | NA | 0 | 28 | NA | 0 | | NA | 0 | | NA | 0 | | NA | 0 | 28 |
| La Palma | 0 | 19 | 10 | 0 | 0 | | 0 | 0 | | 0 | 0 | 1 | 0 | 0 | | 0 | 19 | 11 |
| Laguna Beach | NA | 0 | | NA | 0 | | NA | 0 | | NA | 0 | | NA | 0 | | NA | 0 | 0 |
| Laguna Hills | NA | NA | 0 | NA | NA | 0 | NA | NA | 0 | NA | NA | 0 | NA | NA | 0 | NA | NA | 0 |
| Laguna Niguel | 0 | 0 | | 0 | 0 | | 0 | 0 | 0 | 0 | 0 | | 0 | 0 | | 0 | 0 | 0 |
| Laguna Woods | 0 | 0 | NA | 0 | 0 | NA | 0 | 0 | NA | 0 | 0 | NA | 0 | 0 | NA | 0 | 0 | NA |
| Lake Forest | 11 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 11 | 0 | 0 |
| Los Alamitos | NA | 0 | | NA | 0 | | NA | 0 | | NA | 0 | | NA | 0 | | NA | 0 | 0 |
| Mission Viejo^ | NA | 0 | | NA | 103 | | NA | 0 | | NA | 0 | | NA | 0 | | NA | 103 | 0 |
| Newport Beach | 6 | 8 | 2 | 250 | 618 | 0 | 200 | 315 | 0 | 0 | 0 | 0 | 0 | 550 | 0 | 456 | 1491 | 2 |
| Orange | NA | 66 | 0 | NA | 4 | 1 | NA | 0 | 0 | NA | 0 | 0 | NA | 0 | 0 | NA | 70 | 1 |
| Placentia | 7 | 7 | 10 | 0 | 0 | | 0 | 0 | | 0 | 0 | | 0 | 0 | | 7 | 7 | 10 |
| R S Margarita | 0 | 0 | 2 | 0 | 0 | | 0 | 0 | | 0 | 0 | | 0 | 0 | | 0 | 0 | 2 |
| San Clemente | NA | 7 | 0 | NA | 2 | 0 | NA | 2 | 0 | NA | 0 | 0 | NA | 0 | 0 | NA | 11 | 0 |
| S J Capistrano | 1 | 14 | 10 | 1 | 0 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 2 | 14 | 12 |
| Santa Ana | NA | 0 | 1 | NA | 0 | 2 | NA | 0 | | NA | 0 | | NA | 0 | | NA | 0 | 3 |
| Seal Beach | NA | NA | 5 | NA | NA | 0 | NA | NA | 0 | NA | NA | 0 | NA | NA | 0 | NA | NA | 5 |
| Stanton | DNR | NA | | NA | NA | | NA | NA | | NA | NA | | NA | NA | | NA | NA | 0 |
| Tustin | NA | 0 | 0 | NA | 0 | 0 | NA | 0 | 0 | NA | 0 | 0 | NA | 0 | 0 | NA | 0 | 0 |
| Villa Park | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Westminster | 0 | 0 | 9 | 5 | 0 | 4 | 0 | 0 | | 0 | 0 | | 0 | 0 | | 5 | 5 | 13 |
| Yorba Linda | 0 | 0 | 59 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 59 |
| County of Orange | NA | 0 | 0 | NA | 0 | 0 | NA | 0 | 0 | NA | 0 | 0 | NA | 0 | 0 | NA | 0 | 0 |
| TOTALS | 76 | 1,460 | 275 | 257 | 779 | 66 | 200 | 350 | 22 | 0 | 7 | 6 | 0 | 550 | 2 | 533 | 3,151 | 371 |

NA = Not Available

EL = Educational Letter

ACO = Administrative Compliance Order M/I = Misdemeanor/Infraction

DNR = Did Not Report

NON = Notice of Non-Compliance

CDO = Cease and Desist Order

^ Enforcement actions against industrial facilities are included with commercial facilities.

SECTION 9.0, EXISTING DEVELOPMENT

Table 9.9: Permittee Enforcement Actions for Commercial Facilities, Comparison of 2002-03, 2003-04, and 2004-05

| PERMITTEE | EL 2002-03 | EL 2003-04 | EL 2004-05 | NON 2002-03 | NON 2003-04 | NON 2004-05 | ACO 2002-03 | ACO 2003-04 | ACO 2004-05 | CDO 2002-03 | CDO 2003-04 | CDO 2004-05 | M/I 2002-03 | M/I 2003-04 | M/I 2004-05 | TOTAL 2002-03 | TOTAL 2003-04 | TOTAL 2004-05 |
|------------------|---------------|---------------|---------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|------------------|------------------|------------------|
| Aliso Viejo | 70 | 3 | 4 | 0 | 0 | 4 | 2 | 13 | 2 | 0 | 0 | 2 | 0 | 0 | 1 | 72 | 16 | 13 |
| Anaheim | NA | 0 | | NA | 0 | 0 | NA | 0 | 0 | NA | 0 | 0 | NA | 0 | 0 | NA | 0 | 0 |
| Brea | NA | 4 | 3 | NA | 1 | | NA | 0 | | NA | 0 | | NA | 0 | | NA | 5 | 3 |
| Buena Park | 5 | 0 | | 0 | 87 | 16 | 0 | 19 | 33 | 0 | 4 | 16 | 0 | 0 | 4 | 5 | 110 | 69 |
| Costa Mesa | 2 | 10 | 6 | 3 | 3 | 67 | 0 | 10 | | 0 | 0 | | 0 | 0 | | 5 | 23 | 73 |
| Cypress | 2 | 0 | | 4 | 2 | | 0 | 0 | | 0 | 0 | | 0 | 0 | | 6 | 2 | 0 |
| Dana Point | 13 | 14 | 57 | 41 | 19 | 3 | 1 | 0 | 1 | 0 | 0 | | 1 | 0 | 1 | 56 | 33 | 62 |
| Fountain Valley | 6 | 251 | 256 | 6 | 2 | 4 | 21 | 3 | 7 | 5 | 1 | 2 | 0 | 0 | | 38 | 257 | 269 |
| Fullerton | NA | 0 | NA | NA | 0 | NA | NA | 0 | NA | NA | 0 | NA | NA | 0 | NA | NA | 0 | NA |
| Garden Grove | 5 | 37 | 5 | 2 | 8 | 1 | 0 | 0 | | 0 | 0 | | 0 | 0 | | 7 | 45 | 6 |
| Huntington Beach | 16 | 0 | | 3 | 10 | 13 | 0 | 80 | | 1 | 0 | | 0 | 0 | 5 | 20 | 90 | 18 |
| Irvine | NA | NA | | NA | NA | | NA | NA | | NA | NA | | NA | NA | | NA | NA | 0 |
| La Habra | NA | 0 | | NA | 0 | 25 | NA | 0 | 1 | NA | 0 | | NA | 0 | | NA | 0 | 26 |
| La Palma | 0 | 0 | 15 | 0 | 0 | | 0 | 0 | | 0 | 0 | | 0 | 0 | | 0 | 0 | 15 |
| Laguna Beach | NA | 0 | | NA | 0 | | NA | 0 | 2 | NA | 0 | | NA | 0 | | NA | 0 | 2 |
| Laguna Hills | NA | 11 | 6 | NA | 9 | 4 | NA | 1 | | NA | 0 | | NA | 0 | | NA | 20 | 10 |
| Laguna Niguel | 0 | 127 | | 1 | 15 | 32 | 0 | 0 | | 0 | 0 | | 0 | 0 | | 1 | 142 | 32 |
| Laguna Woods | 3 | 0 | 15 | 4 | 0 | 18 | 1 | 0 | 10 | 0 | 0 | | 0 | 0 | | 8 | 0 | 43 |
| Lake Forest | 77 | 1 | | 1 | 14 | 12 | 0 | 0 | | 0 | 0 | 1 | 0 | 0 | | 78 | 15 | 13 |
| Los Alamitos | NA | 0 | | NA | 0 | | NA | 0 | | NA | 0 | | NA | 0 | | NA | 0 | 0 |
| Mission Viejo | 118 | 0 | 2 | 20 | 103 | 16 | 0 | 0 | 17 | 1 | 0 | 0 | 0 | 0 | 2 | 139 | 103 | 37 |
| Newport Beach | NA | NA | 2 | NA | NA | | NA | NA | | NA | NA | | NA | NA | | NA | NA | 2 |
| Orange | NA | 269 | 0 | NA | 13 | 0 | NA | 0 | 0 | NA | 0 | 0 | NA | 0 | 0 | NA | 283 | 0 |
| Placentia | 10 | 30 | 64 | 0 | 0 | 13 | 1 | 0 | 1 | 2 | 0 | 1 | 0 | 0 | 1 | 13 | 30 | 80 |
| R S Margarita | 10 | 0 | 32 | 0 | 0 | 7 | 0 | 0 | | 0 | 0 | | 0 | 0 | | 10 | 0 | 39 |
| San Clemente | NA | 187 | 91 | NA | 82 | 63 | NA | 15 | | NA | 2 | | NA | 7 | 24 | NA | 293 | 178 |
| S J Capistrano | 25 | 10 | 150 | 7 | 2 | 5 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 32 | 12 | 155 |
| Santa Ana | NA | 0 | 1 | NA | 3 | 18 | NA | 0 | 1 | NA | 0 | | NA | 0 | | NA | 3 | 20 |
| Seal Beach | NA | 0 | 0 | NA | 0 | 0 | NA | 0 | 0 | NA | 0 | 0 | NA | 0 | 0 | NA | 0 | 0 |
| Stanton | DNR | DNR | | DNR | DNR | | DNR | DNR | | DNR | DNR | | DNR | DNR | | NA | DNR | 0 |
| Tustin | NA | 0 | 0 | NA | 0 | 0 | NA | 0 | 0 | NA | 0 | 0 | NA | 0 | 0 | NA | 0 | 0 |
| Villa Park | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Westminster | 0 | 0 | 2 | 0 | 2 | 3 | 0 | 0 | | 0 | 0 | | 0 | 0 | | 0 | 2 | 5 |
| Yorba Linda | 0 | 45 | 19 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 46 | 19 |
| County of Orange | NA | 0 | 0 | NA | 4 | 3 | NA | 0 | 0 | NA | 0 | 0 | NA | 0 | 0 | NA | 4 | 3 |
| TOTALS | 362 | 999 | 730 | 92 | 380 | 327 | 26 | 141 | 75 | 9 | 7 | 22 | 1 | 7 | 38 | 490 | 1,534 | 1,192 |

NA = Not Available

EL = Educational Letter

ACO = Administrative Compliance Order

M/I = Misdemeanor/Infraction

DNR = Did Not Report

NON = Notice of Non-Compliance

CDO = Cease and Desist Order

Figure 9.1: Countywide Permittees' Industrial Inventory and Prioritization, Comparison of 2002-03, 2003-04 and 2004-05

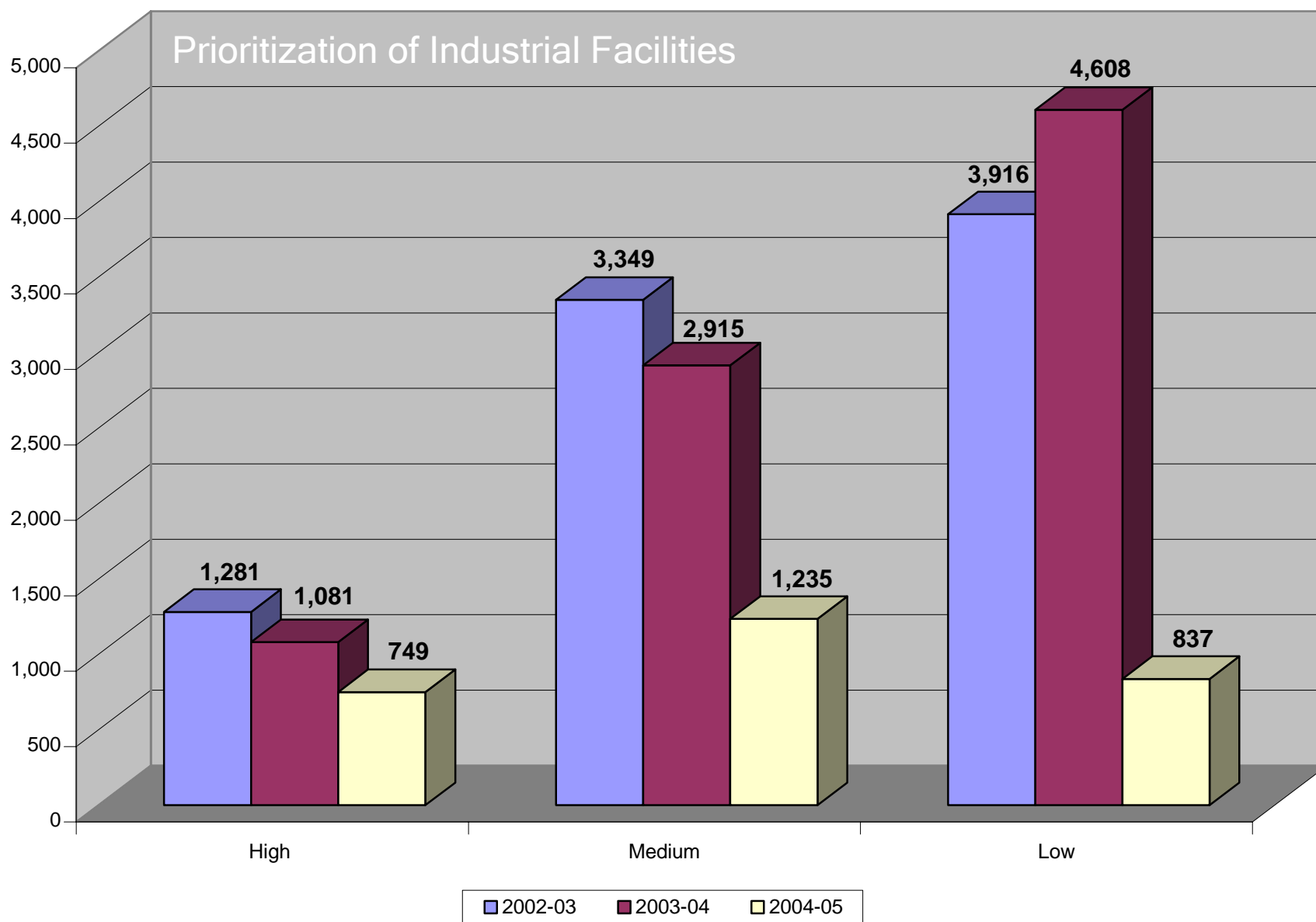


Figure 9.2: Countywide Permittees' Commercial Inventory and Prioritization, Comparison of 2002-03, 2003-04 and 2004-05

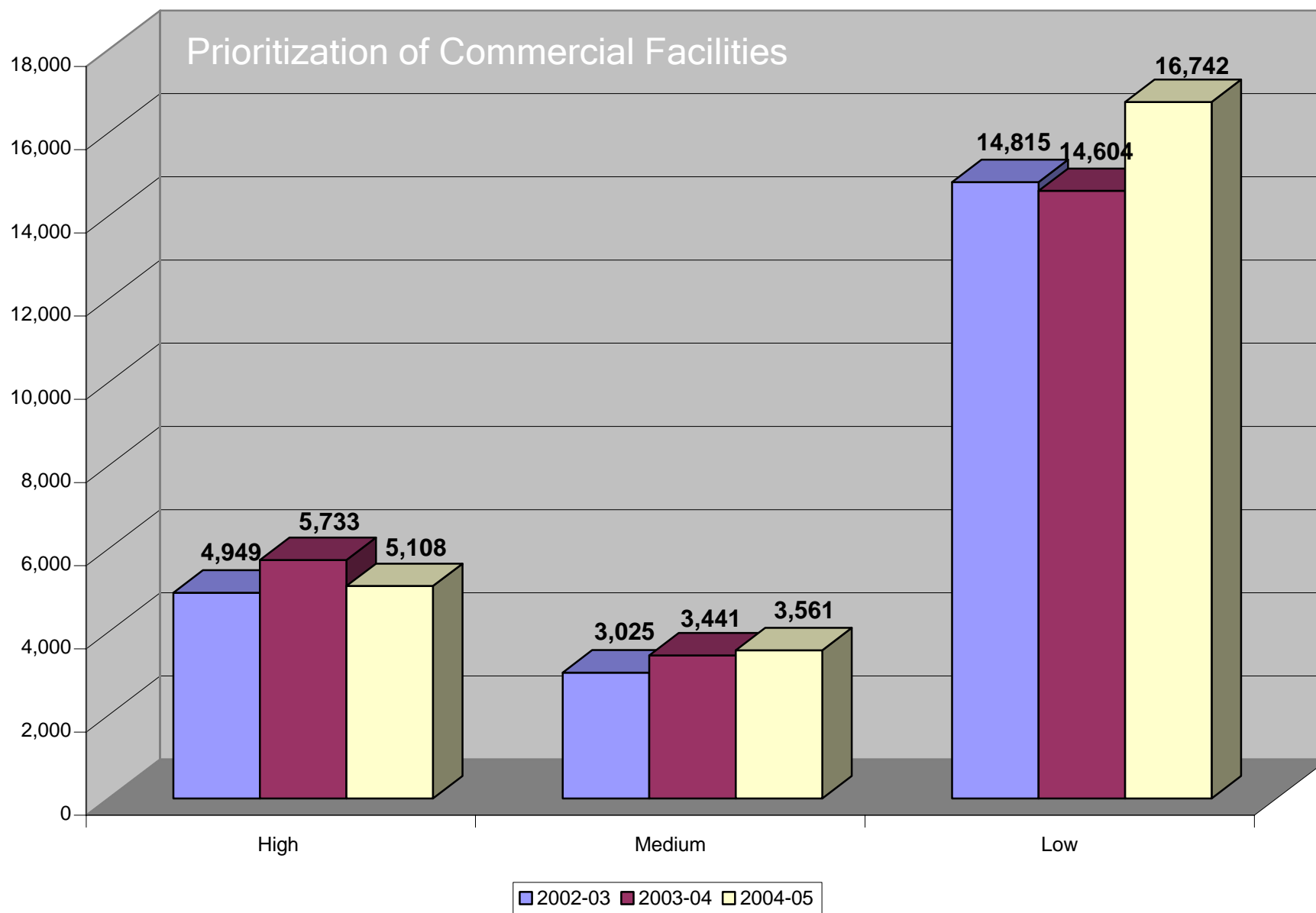


Figure 9.3: Industrial Inventory and BMP Implementation, Comparison of 2002-03, 2003-04 and 2004-05

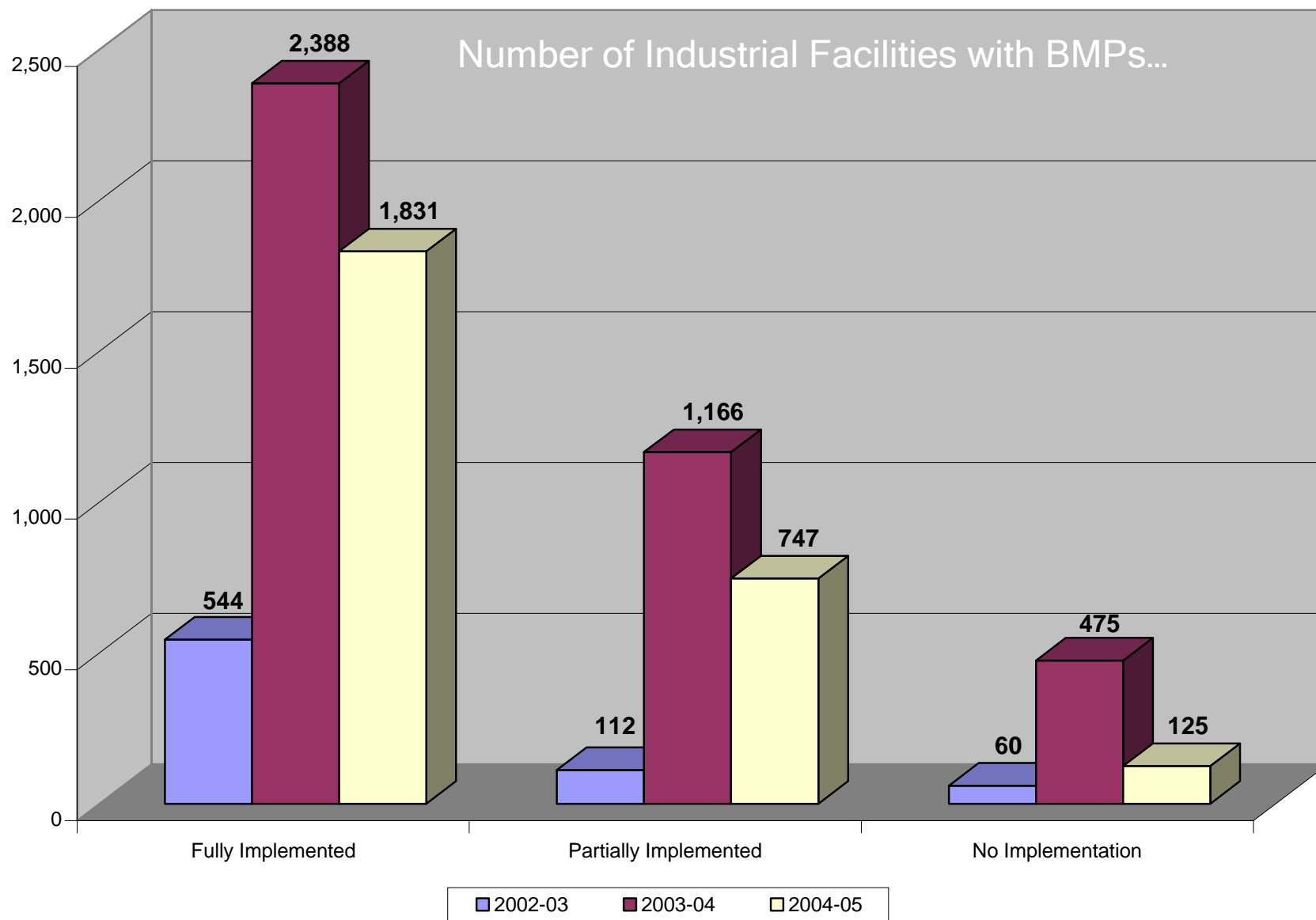


Figure 9.4: Commercial Inventory and BMP Implementation, Comparison of 2002-03, 2003-04 and 2004-05

